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Attorneys for Gregory M. Garvin,  
Acting United States Trustee for Region 18, Plaintiff

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON**

In re

Peter Szanto,

Debtor.

United States Trustee,

Plaintiff,

v.

Peter Szanto,

Defendant.

Case No. 16-33185-pcm7

Adversary No. 18-03022-pcm

**DECLARATION OF MICHAEL  
CONNOLLY IN SUPPORT OF  
UNITED STATES TRUSTEE'S  
OBJECTION TO DEFENDANT'S  
MOTIONS TO QUASH  
SUBPOENAS**

I, Michael Connolly, hereby declare under penalty of perjury:

1. I am employed as a Paralegal Specialist for the United States Trustee, the plaintiff in the above-referenced adversary proceeding. I have personal knowledge of the matters contained herein.

2. On September 12, 2018, I placed in the United States Mail notices of subpoenas with a copy of the subpoena addressed to defendant Peter Szanto ("Defendant") at 11 Shore Pine, Newport Beach, CA 92657 at the direction and under the supervision of United States Trustee

Trial Attorney Carla Gowen McClurg, including:

- a. A Notice of Document Subpoena and Subpoena dated September 12, 2018 requesting bank account documents from American Express Company, a true and correct copy of which is attached to this declaration as Exhibit 1;
- b. A Notice of Document Subpoena and Subpoena dated September 12, 2018 requesting credit card account documents from American Express Company, a true and correct copy of which is attached to this declaration as Exhibit 3;
- c. A Notice of Document Subpoena and Subpoena dated September 12, 2018 requesting bank account documents from Bank of America, N.A., a true and correct copy of which is attached to this declaration as Exhibit 5;
- d. A Notice of Document Subpoena and Subpoena dated September 12, 2018 requesting credit card account documents from Capital One Bank (USA), N.A., a true and correct copy of which is attached to this declaration as Exhibit 7;
- e. A Notice of Document Subpoena and Subpoena dated September 12, 2018 requesting bank account documents from US Bank, N.A., a true and correct copy of which is attached to this declaration as Exhibit 9;
- f. A Notice of Document Subpoena and Subpoena dated September 12, 2018 requesting bank account documents from First Republic Bank, a true and correct copy of which is attached to this declaration as Exhibit 11;
- g. A Notice of Document Subpoena and Subpoena dated September 12, 2018 requesting bank account documents from JP Morgan Chase Bank, N.A., a true and correct copy of which is attached to this declaration as Exhibit 13;
- h. A Notice of Document Subpoena and Subpoena dated September 12, 2018 requesting bank account documents from Union Bank, N.A., a true and correct copy of which is attached to this declaration as Exhibit 15;
- i. A Notice of Document Subpoena dated August 12, 2018 (a typographical error) and Subpoena dated September 12, 2018 requesting financial account documents

from E\*Trade Securities LLC, a true and correct copy of which is attached to this declaration as Exhibit 17; and

- j. A Notice of Document Subpoena and Subpoena dated September 12, 2018 requesting financial account documents from Ford Motor Credit Company, LLC, a true and correct copy of which is attached to this declaration as Exhibit 19.

3. On September 13, 2018, I served subpoenas on banks and financial institutions consistent with the cover letters addressed to each entity with a copy of the letters, subpoenas, and related documents to Defendant by first-class United States Mail addressed to Defendant at 11 Shore Pine, Newport Beach, CA 92657 at the direction and under the supervision of United States Trustee Trial Attorney Carla Gowen McClurg. The subpoenas, letters, and related documents that I served on banks and financial institutions with copies to Defendant included:

- a. Cover letter dated September 12, 2018; Subpoena dated September 12, 2018 requesting bank account records; and blank Declaration of Custodian of Records to American Express Company, a true and correct copy of which is attached to this declaration as Exhibit 2;
- b. Cover letter dated September 12, 2018; Subpoena dated September 12, 2018 requesting credit card account records; and blank Declaration of Custodian of Records to American Express Company, a true and correct copy of which is attached to this declaration as Exhibit 4;
- c. Cover letter dated September 12, 2018; Subpoena dated September 12, 2018 requesting bank account records; and blank Declaration of Custodian of Records to Bank of America, N.A., a true and correct copy of which is attached to this declaration as Exhibit 6;
- d. Cover letter dated September 12, 2018; Subpoena dated September 12, 2018 requesting credit card account records; and blank Declaration of Custodian of Records to Capital One Bank (USA), N.A., a true and correct copy of which is attached to this declaration as Exhibit 8;

- e. Cover letter dated September 12, 2018; Subpoena dated September 12, 2018 requesting bank account records; and blank Declaration of Custodian of Records to US Bank N.A., a true and correct copy of which is attached to this declaration as Exhibit 10;
  - f. Cover letter dated September 12, 2018; Subpoena dated September 12, 2018 requesting bank account records; and blank Declaration of Custodian of Records to First Republic Bank, a true and correct copy of which is attached to this declaration as Exhibit 12;
  - g. Cover letter dated September 12, 2018; Subpoena dated September 12, 2018 requesting bank account records; and blank Declaration of Custodian of Records to JP Morgan Chase Bank N.A., a true and correct copy of which is attached to this declaration as Exhibit 14;
  - h. Cover letter dated September 12, 2018; Subpoena dated September 12, 2018 requesting bank account records; and blank Declaration of Custodian of Records to Union Bank N.A., a true and correct copy of which is attached to this declaration as Exhibit 16;
  - i. Cover letter dated September 12, 2018; Subpoena dated September 12, 2018 requesting financial account records; and blank Declaration of Custodian of Records to E\*Trade Securities, LLC, a true and correct copy of which is attached to this declaration as Exhibit 18; and
  - j. Cover letter dated September 12, 2018; Subpoena dated September 12, 2018 requesting financial account records; and blank Declaration of Custodian of Records to Ford Motor Credit Company LLC, a true and correct copy of which is attached to this declaration as Exhibit 20.
4. I communicated by phone with a representative of Ford Motor Credit Company, LLC requesting that the United States Trustee reissue the subpoena listing the complete entity name “Ford Motor Credit Company, LLC/Ford Interest Advantage” in order to obtain records.

5. On September 26, 2018, I placed in the United States Mail a notice of subpoena with a copy of the subpoena dated September 26, 2018 that was reissued to Ford Motor Credit Company, LLC/Ford Interest Advantage, a true and correct copy of which is attached to this declaration as Exhibit 21. I addressed the envelope in which I placed the notice of subpoena and subpoena for the subpoena dated September 26, 2018 that was reissued to Ford Motor Credit Company, LLC/Ford Interest Advantage to Defendant at 11 Shore Pine, Newport Beach, CA 92657 at the direction and under the supervision of United States Trustee Trial Attorney Carla Gowen McClurg.

6. On September 27, 2018, at the direction and under the supervision of United States Trustee Trial Attorney Carla Gowen McClurg, I served a cover letter, Subpoena dated September 26, 2018; and blank Declaration of Custodian of Records on Ford Motor Credit Company LLC/Ford Interest Advantage at the address listed on the cover letter with a copy to Defendant, true and correct copies of which are attached to this declaration as Exhibit 22.

DATED this 28th September, 2018.

/s/ Michael Connolly  
Michael Connolly

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 1, 2018, I served a copy of the foregoing

**DECLARATION OF MICHAEL CONNOLLY IN SUPPORT OF UNITED STATES**

**TRUSTEE'S OBJECTION TO DEFENDANTS MOTIONS TO QUASH SUBPOENAS**

with all attached exhibits by mailing a copy of this document, by United States first class mail, postage prepaid, addressed to the following:

Peter Szanto  
11 Shore Pine  
Newport Beach, CA 92657

I further certified that I emailed a copy of the foregoing document with all exhibits to the defendant on October 1, 2018 at the following email address: [szanto.pete@gmail.com](mailto:szanto.pete@gmail.com).

GREGORY M. GARVIN  
Acting United States Trustee for Region 18

/s/ Carla Gowen McClurg  
CARLA GOWEN McCLURG, OSB #165144  
Trial Attorney